

Little Traverse Bay Bands of Odawa Indians

Hotline Policy

- Title:** Hotline Policy
- Purpose:** To provide a mechanism for anonymous reporting of financial matters for the Tribal government and its enterprises.
- Scope:** The Tribal Government and all of its enterprise activities and financial matters related thereto.
- Policy:** All reports received on the hotline will be processed through the following hierarchy:

The Tribal Council or audit Committee will receive notification via email that a report has been filed and the classification of that report. Once a month the Audit Committee will receive a report showing case number, classification of report and status of each report by division. To preserve the integrity of the investigation and to ensure due process, all requests from audit committee members for report details shall be communicated through the Tribal Chairman.

Tribal Government: detail reports will be sent to Tribal Administrator, CFO and Director of HR (Tribal)

Non-Gaming Enterprises: detail reports will be sent to Tribal Administrator, CFO, enterprise manager.

Victories Casino: detail reports will be sent to Director Gaming Regulatory, CFO, General Manager.

Victories Hotel: detail reports will be sent to Director Gaming Regulatory, CFO, General Manager, Hotel Manager.

Law Enforcement will be notified whenever there is a suspicion of criminal activity.

If any report recipient is named in a report he/she will not receive or have access to the report.

Recognizing the unique responsibilities of the Regulatory Commission The regulatory director will notify the Gaming Regulatory Commission Chairperson only when a licensing issue may be present following an investigation.

All reports will be handled appropriately in a timely manner and in accordance with procedures.

Reports generated by the hotline shall be kept confidential and shall not be disseminated.